

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Counsel to Substantial Contribution Claimants

In Re:

LTL MANAGEMENT LLC,

Debtor.

Case No. 21-30589 (MBK)

Chapter 11

Honorable Michael B. Kaplan, U.S.B.J.,
Chief

**NOTICE OF OMNIBUS MOTION OF THE SUBSTANTIAL CONTRIBUTION
CLAIMANTS FOR ALLOWANCE OF ADMINISTRATIVE CLAIMS FOR
REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM
OCTOBER 14, 2021 THROUGH NOVEMBER 12, 2021 (PRIOR TO THE OFFICIAL
COMMITTEE OF TALC CLAIMANTS' RETENTION OF COUNSEL) THAT
PROVIDED A SUBSTANTIAL CONTRIBUTION IN THE DEBTOR'S CASE**

PLEASE TAKE NOTICE that the Substantial Contribution Claimants (as defined in the Motion) submitted herewith (the "Movants"), by and through their undersigned counsel, shall move before the Honorable Michael B. Kaplan, U.S.B.J., Chief, on **June 22, 2023 at 10:00 a.m.** or as soon thereafter as counsel may be heard, at the U.S. Bankruptcy Court, District of New Jersey, 402 East State Street, Trenton, NJ 08608, seeking the entry of an Order allowing administrative claims for reimbursement of fees and expenses incurred for the twenty-nine (29) day period from October 14, 2021 through November 12, 2021 from the Petition Date (as defined

in the Motion) until the appointment of the Official Committee of Talc Claimants and its retention of counsel (the “Motion”).

PLEASE TAKE FURTHER NOTICE THAT the Movants file the within Motion in accordance with the terms of the April 4, 2023 Order (I) Dismissing Debtor’s Chapter 11 Case Pursuant to 11 U.S.C. § 1112(b); (II) Establishing Procedures With Respect to Requests for Compensation; and (III) Granting Related Relief (the “Dismissal Order”) which authorized the filing of the Motion within thirty (30) days of entry. *See* Docket No. 3938, ¶ 8. The Dismissal Order provides that the within case will not be closed until completion of several conditions, including that all Substantial Contribution Motions (as defined in the Dismissal Order) have been heard by this Court. *Id.* at ¶ 2. The Court specifically retained jurisdiction to, *inter alia*, consider the Substantial Contribution Motions (as defined in the Dismissal Order). *Id.* at ¶ 20. The Substantial Contribution Claimants have scheduled June 22, 2023 as the initial return date which is subsequent to the May 22, 2023 return date on the Debtor’s motion seeking authority to, *inter alia*, satisfy the conditions of the Dismissal Order which was filed in the second bankruptcy proceeding under Case No. 23-12825, Docket No 319.¹

PLEASE TAKE FURTHER NOTICE, that the Movants shall rely upon the Motion filed herewith which sets forth the legal basis for the relief requested and certifications submitted herewith in support of the relief sought.

PLEASE TAKE FURTHER NOTICE that in accordance with D.N.J. LBR 9013-2(a) and the Dismissal Order, opposition to the relief requested, and, or cross-motions, if any, shall be

¹ The Substantial Contribution Claimants have expressed a concern that if they fail to comply with the time parameters set forth by this Court in its Dismissal Order, they will lose any opportunity to seek the allowance of substantial contribution claims. Consequently, they are seeking a determination of substantial contribution claims as stated in the Dismissal Order, and understand that in light of the Debtor’s subsequent bankruptcy filing, the Court will have to determine if, and when, this matter shall proceed, and to the extent the claims are allowed, to be paid by the Debtor in the same manner as all other retained professionals in this case.

filed with the Clerk of the Bankruptcy Court and served upon all parties in interest at least seven (7) days before the hearing date of the Motion.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed, the Motion shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-3(a), in the event the Motion is contested, there is a duty to confer to determine whether a consent order may be entered disposing of the Motion or to stipulate to the resolution of as many issues as possible.

PLEASE TAKE FURTHER NOTICE that in accordance with LBR 9013-3(e), unless the Court authorizes otherwise prior to the hearing date hereof, no testimony shall be taken at the hearing except by certification or affidavit.

Date: May 3, 2023

Respectfully submitted,

**SHERMAN, SILVERSTEIN,
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